

## CARROLL'S TURKEYS LLC

P. O. Drawer 856 WARSAW, NORTH CAROLINA 28398

September 17, 2004

Dr. Lester M. Crawford Acting Commissioner Feed and Drug Administration 5600 Fisher Lane Rockville, MD 20857

Dear Dr. Crawford:

My name is Shannon Jennings. I have been the corporate veterinarian for Carroll's Turkeys LLC for 17 years. I have a BS and Masters from Clemson University and earned my Doctor of Veterinary Medicine from the University of Georgia, and I am Board Certified by the College of Poultry Veterinarians.

I am writing you with regards to the Fluoroquinolone (Baytril) issue being considered by your office. I am concerned that if the industry loses Baytril we will be losing a unique antibiotic used to fight severe cases of <u>E. coli</u> or Fowl Cholera (<u>Pasturella multocida</u>) infections.

Preventing diseases in our flocks is my goal, but despite best efforts and good management, diseases will still occur.

I have had to use Baytril from time to time to treat severe infections in our turkey flocks. I have never seen an antibiotic work as well as Baytril to reduce disease and animal suffering. I am only talking about 3-4% of the flocks, but it is the drug of last resort. Prior to Baytril being introduced on the market, I have seen on several instances a virulent strain of Fowl Cholera kill a whole house of turkeys in 5 days despite the antibiotics available at the time. I prescribed Baytril on this same scenario two years ago, and it stopped the dying and brought the mortality back to normal levels in 4 days. This disease without Baytril could easily put our turkey farmers out of business if you withdraw it from the market.

It is my understanding that the work done on risk assessment to human health pertaining to Baytril, use was done on chicken and not turkey. Having worked with both species my entire professional career, there are tremendous differences in the resident intestinal bacterial populations, conditions in which each is grown, methods of processing and how final products are marketed to the public.

This also would set a precedent for the removal of other antibiotics based more on emotions rather than science. I would urge you to appoint an independent panel of scientific experts, to include poultry veterinarians, to review all the information pertaining to the human health risks from the way Baytril is currently used. Once a true scientific review is done I believe it will **not** support the removal of enrofloxacin (Baytril) in poultry.

Sincerely,

R. Shannon Jennings, DVM, ACPV

Corporate Veterinarian Carrolls Turkey's, LLC

CC: Dockets Management Branch, ref. # 00N-1571

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